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Attorneys for Defendants  
VXN GROUP LLC; STRIKE 3 HOLDINGS, LLC;  
GENERAL MEDIA SYSTEMS, LLC; and  
MIKE MILLER

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

MACKENZIE ANNE THOMA, a.k.a.  
KENZIE ANNE, an individual and on  
behalf of all others similarly situated,

Plaintiff,  
v.

VXN GROUP LLC, a Delaware limited  
liability company; STRIKE 3  
HOLDINGS, LLC, a Delaware limited  
liability company; GENERAL MEDIA  
SYSTEMS, LLC, a Delaware limited  
liability company; MIKE MILLER, an  
individual; and DOES 1 to 100, inclusive,

Defendants.

Case No. 2:23–CV–04901–WLH–  
AGR

**SUPPLEMENTAL  
DECLARATION OF TAYLOR  
BROCK IN SUPPORT OF  
DEFENDANT’S OPPOSITION TO  
PLAINTIFF’S MOTION TO  
REMAND ACTION TO STATE  
COURT**

[Los Angeles County Superior Court  
Case No. 23STCB08761]

**DECLARATION OF TAYLOR BROCK**

I, Taylor Brock, declare and state as follows:

1. I am over the age of eighteen years and am fully competent to make this declaration. The facts contained herein are based on my personal knowledge and are true and correct.

2. I am a Producer for VXN Group, LLC (“VXN”). I have been employed in this position since the company’s inception in January, 2020 and have actively participated on-set in the production of VXN’s films.

3. In my capacity as a Producer, I have personal knowledge of the routine manner in which VXN film sets operate, including the scheduling, management, and requirements of various films.

4. Films produced by VXN consist of two distinct types of movies: Type-I movies and Type-II movies. Type-I movies typically involve a different and more complex filming style that results in a longer duration on set. Type-I brands include “Vixen”, “Blacked,” “Slayed,” and “Tushy.” Type-II brands include “Blacked Raw,” and “Tushy Raw.”

5. To the best of my knowledge, from the time of VXN’s inception (January 2020) to the present day, nearly all Type-I films have an on-set production duration of at least ten (10) hours. It is extremely rare for a Type-1 film to wrap in less than ten (10) hours. Actors need to be on set during this time to complete hair and makeup, wardrobe, on set documentation and paperwork, rehearsals with the directors, as well as actual filming. I know this because my job requires me to be on set for the production of these films. In the past four years, I have been on set for nearly every Type 1 film production.

6. The reasons for the long duration of Type-I films are manifold:

a. Complexity of Filming Techniques: Type-I films involve higher complexity in filming techniques, including but not limited to intricate

1 camera movements, special effects, and precise lighting. These  
2 complexities necessitate additional time for setup, execution, and  
3 adjustments.

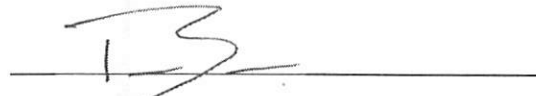
4 b. Detailed Makeup and Costumes: Actors in Type-I films usually  
5 require more detailed and elaborate makeup and wardrobe. The application  
6 and maintenance of these elements can be time-consuming.

7 c. More Complex Script: Type-I films often involve a more detailed  
8 plot line, script, and production budget.

9 7. The on-set production duration for Type-1 films is at least ten (10)  
10 hours. These production hours occur consecutively within the same calendar  
11 workday.

12 I declare under penalty of perjury under the laws of the United States that  
13 the foregoing is true and correct.

14 Executed this \_\_28\_\_ day of July, 2023, at Los Angeles, California.

15  
16   
17 Taylor Brock

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